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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

v.

Donovan Adair Metoyer,

Defendant.

Case: 2:22-cr-20171

Judge: Cox, Sean F.

MJ: Stafford, Elizabeth A.

Filed: 03-29-2022

INDI USA VS METOYER (DP)

Violation:

18 U.S.C. § 922(g)(3)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

*(18 U.S.C. § 922(g)(3) – Possession of a Firearm by an Unlawful User of a
Controlled Substance)*

From in or about the fall of 2021, through and including March 12, 2022, the defendant, DONOVAN ADAIR METOYER, knowing that he was an unlawful user of a controlled substance as defined in 21 U.S.C. Sec. 802, knowingly possessed firearms, that is, one Glock 40 and one Glock 43, said firearms having been shipped and transported in interstate and foreign commerce; in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

FORFEITURE ALLEGATION

1. Pursuant to Fed. R. Cr. P. 32.2(a), the government hereby provides notice to the defendants of its intention to seek forfeiture of all proceeds, direct or indirect, or property traceable thereto, all property that facilitated the commission of the violations alleged, or property traceable thereto, and all property involved in, or property traceable thereto, of the violations set for in this Indictment.

2. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of Defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL

s/Grand Jury Foreperson

GRAND JURY FOREPERSON

DAWN N. ISON

United States Attorney

s/Craig F. Wininger

CRAIG F. WININGER

Chief, Violent & Organized Crime
Unit

s/Matthew Roth

MATTHEW ROTH

Assistant United States Attorney

Dated: March 29, 2022

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number:
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number: 21-20668
This may be a companion case based on LCrR 57.10(b)(4) ¹ :	Judge Assigned: Nancy G. Edmunds
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	AUSA's Initials: <i>RE</i>

Case Title: USA v. Donovan Adair Metoyer

County where offense occurred: Oakland

Offense Type: Felony

Indictment -- based upon prior complaint [Case number: 22-mj-30145]

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

Reason:

Defendant Name

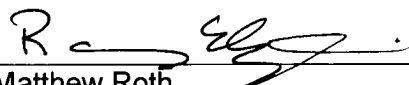
Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case

March 29, 2022

Date

for Matt Roth

 Matthew Roth
 Assistant United States Attorney
 211 W. Fort Street, Suite 2001
 Detroit, MI 48226
 Matthew.Roth2@usdoj.gov
 (313) 226-9186
 Bar #: P58549

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.